

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

Chandra Cook on behalf of herself  
and all others similarly situated,

Plaintiff,

v.

Darius Mitchell and Paul Hicks  
doing business as Pleasers.

Defendants.

CASE NO. 1:13-CV-03518

JURY TRIAL DEMANDED

**JOINT NOTICE OF TENTATIVE SETTLEMENT AND MOTION TO STAY  
CASE FOR THIRTY (30) DAYS IN ORDER TO CONSUMMATE SAME**

**NOW COME** the parties, by and through their respective undersigned Counsel, and hereby give notice that the parties have reached a tentative settlement of this action. More specifically, Defendant has offered a sum certain, and a majority of the 42 named and opt-in Plaintiffs have agreed to the sum offered.

To date, not every named and/or opt-in Plaintiff has expressly consented to the tentative settlement. The parties jointly request, therefore, that this matter be stayed for a period of thirty (30) days, during which period the parties will diligently attempt to consummate the settlement and submit an appropriate motion seeking the Court's approval of same, or, in the event that unanimous consent cannot be achieved, to present an alternative framework to the Court for bringing this matter to a conclusion.

Respectfully submitted this 9th day of July, 2015.

/s/ Harlan S. Miller

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**CERTIFICATE OF COMPLIANCE**

This is to certify that the foregoing has been prepared using Times  
New Roman 14 point font.

This 9th day of July, 2015.

/s/ Harlan S. Miller

Harlan S. Miller

Of Counsel

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